

1 Q. So when you received notice of this meeting, which
2 you've stated you believe was by phone, what were you told
3 would be the purpose of this meeting?

4 A. The Booker T. Washington Center right now has a
5 situation that happened, and we need to have a board meeting
6 to discuss the situation.

7 Q. What situation was being referred to?

8 A. The situation that was being referred to a young
9 lady who was left at a movie theater, and from a public
10 standpoint it looked as if the Booker T. Washington Center
11 was negligent, and we needed to know how we were going to be
12 acting.

13 Q. Now, prior to August of 2002 -- let me withdraw the
14 question. Were you aware that Mr. Sherrod was on vacation in
15 August of 2002?

16 A. I can't say I was aware he was on vacation, but I
17 did know that we both were going to do something that
18 weekend.

19 Q. What weekend are you referring to?

20 A. The week -- there was -- basically, I believe, that
21 some of this took place like either a Monday or a Tuesday,
22 and I know that Mr. Sherrod and I met, probably on a
23 Wednesday or a Thursday, to talk about our plans to -- for
24 the management committee. And then we said, well, we'll get
25 together back when we -- you know, when we come back because

1 I told him I was going to Connecticut at that time. When I
2 got back from Connecticut, I got a phone call we were going
3 to have a meeting, and I showed up at the meeting.

4 Q. So you were out of town when this incident involving
5 the little girl occurred?

6 A. I believe I was out of town. If I was in town, I
7 wasn't aware of it because I probably wasn't watching the
8 news. But I believe I was out of town, yes.

9 Q. Would it be helpful for you to know that this
10 incident involving the little girl occurred on August the
11 6th, 2002?

12 A. And that day was a Thursday? A Monday? A Tuesday?

13 Q. It was a weekday.

14 A. Right.

15 Q. So you said you had a prior conversation with
16 Mr. Sherrod and that both of you were planning something.

17 A. Correct.

18 Q. And prior to leaving you had gotten together to
19 discuss the management committee business.

20 A. Correct. And our -- what we were going to be doing
21 in the future.

22 Q. Now, did you know how long Mr. Sherrod would be away
23 from the agency?

24 A. No, I did not.

25 Q. Was it board policy that when Mr. Sherrod was away

1 from the agency for an extended period of time that the
2 controller, Brian Bessetti --

3 MR. MARTINUCCI: Bessetti.

4 Q. Bessetti, I'm sorry. Would be in charge?

5 A. I don't think -- I don't know any policy that was
6 anything like that.

7 Q. You don't recall any such policy?

8 A. No.

9 Q. Is there a possibility that was a policy and you
10 simply were not aware of it?

11 A. That's a possibility.

12 Q. Would you describe for us the role of Mr. James
13 Hamilton, the president of the board of directors.

14 A. That would be outlined in the bylaws of what the
15 president's role would be, wouldn't it?

16 Q. Well, let me ask you this question here. You came
17 on the board in January of '02?

18 A. Yes.

19 Q. Was Mr. Hamilton present for every board of
20 directors' meeting?

21 A. No.

22 Q. From January of '02 until August -- the end of
23 August of '02, would it be correct to say that Mr. Sean
24 Coleman pretty much ran the board of directors' meetings?

25 A. Yes.

1 Q. From January of '02 to, let's say, the end of August
2 of '02, would it be correct to say that Mr. Sean Coleman
3 showed up at the Booker T. Washington Center on almost a
4 daily basis?

5 A. I wouldn't know that.

6 Q. Beginning in August of '02, when is the first time
7 that you learned of this incident involving the little girl?

8 A. When I was notified of the board meeting.

9 Q. Now, when you appeared for this board of directors'
10 meeting, was there an agenda for the meeting?

11 A. I don't recall.

12 Q. At this meeting did the board of directors receive
13 any reports, including the incident involving the little girl
14 on August the 6th of '02?

15 A. I don't believe we received any written reports.

16 Q. Did you receive any oral reports?

17 A. During the meeting we did ask for an update of what
18 was going on, yes.

19 Q. Who did you receive that report from?

20 A. Mr. Sherrod.

21 Q. Now, was Mr. Hamilton in charge of this particular
22 meeting?

23 A. I'm not even sure if Mr. Hamilton was there. I
24 don't think he was there.

25 Q. As best as you can recall, was Mr. Coleman there?

1 A. Yes, Mr. Coleman was there.

2 Q. Was Mr. Coleman there running the meeting?

3 A. It's hard to say. I don't -- I don't recall whether
4 or not he called the meeting to order or who called. There
5 was several people talking at the time.

6 Q. Who was managing the meeting?

7 A. I honestly don't recall.

8 Q. There was no one trying to maintain order in this
9 meeting?

10 A. Like I said, we had 12, or whatever, people on
11 the -- in the room. Basically it was just a meeting of
12 professional people getting together and having a
13 conversation, in my book, and I don't know if anyone in
14 particular took a lead. But I do know that there were
15 discussions during the meeting and reference to the event.

16 Q. And, to your knowledge, there was no written report
17 given to the board of directors at this meeting?

18 A. To my knowledge, no.

19 Q. Is there anyplace that you can look to confirm
20 whether any documentation, any report, in writing, was given
21 to the board of directors at this meeting?

22 A. I don't recall of any document being given, and
23 therefore, I couldn't have an idea of --

24 Q. Who did the board of directors receive its
25 information from?

1 A. Mr. Sherrod.

2 Q. Now, would you describe Mr. Sean Coleman's role in
3 this meeting.

4 A. His role in the meeting was the role of a board
5 member, just having a discussion.

6 Q. What information, if any, did he provide to the
7 board of directors?

8 A. He provided, I guess, the information that --
9 what -- what his actions were during this time, and what his
10 knowledge of the situation was.

11 Q. So what did he say was his actions?

12 A. He basically said that -- I can't recall exactly
13 what he said. All I know is that he just gave an account of
14 his knowledge of what took place. What he knew about what
15 took place with the girl. What he knew about whether or not
16 she got home. Whether or not she -- you know, who was at the
17 place. Who he talked to possibly. It was just a recount of
18 what had happened, I believe.

19 Q. Now, other than the board of directors, were there
20 anyone else present at this meeting?

21 A. I believe Mr. Bessetti was called in eventually. I
22 believe. And possibly Ms. Smith was called in. I'm not
23 sure, though. I've had a number of meetings.

24 Q. At what time did this meeting take place?

25 A. I'm not sure, but I'm going to say it's possible

1 that it could be noon.

2 Q. And at what time would you say Mr. Bessetti was
3 called in?

4 A. Probably 40 minutes after.

5 Q. And Ms. Smith?

6 A. I don't recall what time she was called in or
7 anything else, but --

8 Q. Were they called in together or separately?

9 A. I don't recall.

10 Q. Now, did the board receive any reports from staff
11 about the incident of August the 6th?

12 A. I'm not sure.

13 Q. Did the board talk with any staff about the incident
14 of August the 6th?

15 A. We talked to Mr. Bessetti during that meeting, I
16 believe, or asked him a question or two.

17 Q. How long did the meeting go on?

18 A. I don't recall. No more than two hours I'd say. No
19 less than an hour.

20 Q. So you estimated from about noon to 2:00?

21 A. No more than that time.

22 Q. Now, you said Mr. Sherrod was in this meeting. Was
23 he in this meeting the entire time?

24 A. No.

25 Q. Were you in the meeting the entire time?

1 A. No.

2 Q. At some point did Mr. Sherrod go to his office?

3 A. Yes.

4 Q. Did you follow him into his office?

5 A. Yes.

6 Q. At that time did Mr. Sherrod tell you that he was
7 not resigning as executive director of the Booker T.
8 Washington Center?

9 A. No.

10 Q. He never told you he wasn't resigning?

11 A. Our conversation was, James, what's going on. This
12 is crazy.

13 Q. That's what you're saying?

14 A. That's what I said to him. He basically said,
15 they've been after me for a long time. I said, what do you
16 mean. He said, they've -- they've -- you know, they've been
17 after me for a very long time, and I'm just tired of it. I'm
18 sick and tired of it. I don't want to deal with it anymore.
19 I said, do you know what you just did. He said, I'm just
20 sick and tired of it. I don't even want to talk about it.
21 I'm tired.

22 Q. Now, at that time did you ask Mr. Sherrod for his
23 keys to the Booker T. Washington Center office building?

24 A. I'm not sure. I don't know if it was that day. I
25 think we received keys at a later time.

1 Q. You didn't receive them personally?

2 A. I'm not sure how the keys took place.

3 Q. So you're not sure whether you received the keys
4 from Mr. Sherrod personally?

5 MR. MARTINUCCI: On that date?

6 MS. BENSON: On that date.

7 A. That part, like I said, is not clear. If I did
8 receive any keys, they -- you know -- again, I don't really
9 recall that.

10 Q. Is it possible that you asked Mr. Sherrod for his
11 keys on that date when you followed him into the office?

12 A. It's possible that Mr. Sherrod said, here's the
13 keys, but I don't think I asked him for the keys.

14 Q. Is it possible that you asked him for the keys?

15 A. I don't think I asked Mr. Sherrod for the keys.
16 That was not my intent of walking into the office.

17 Q. I want to get back to who was running the meeting
18 that day. Who was running the meeting on that day?

19 A. I'm not sure.

20 Q. Can you recall? I realize you may not be sure, but
21 can you, to the best of your ability, recall who was running
22 the meeting that day?

23 MR. MARTINUCCI: Bill, you can answer, but just for
24 the record, that's been asked and answered about
25 five times now.

1 A. I can't recall --

2 Q. Is it --

3 A. -- who was running the meeting.

4 Q. Is it possible --

5 MR. MARTINUCCI: Would you let him answer the
6 question, please.

7 Q. I'm sorry.

8 A. I do know several board members had basically voiced
9 their opinions during the meeting, but I don't recall who was
10 supposedly running the meeting.

11 Q. Is it possible that Mr. Coleman, in his capacity as
12 vice president of the board of directors, was running the
13 meeting?

14 A. It's possible.

15 Q. Is it possible that Mr. Coleman called the meeting?

16 A. It's possible.

17 Q. Is it possible that you received a call from
18 Mr. Coleman notifying you of the meeting?

19 A. It's possible.

20 Q. Is it likely that you received a call from
21 Mr. Coleman notifying you of the meeting?

22 A. Through my recollection, I believe I -- I got
23 notification from Cathy Lyons.

24 Q. Is it probable that Mr. Coleman, in his capacity as
25 vice president of the board of directors, ran the meeting?

1 MR. MARTINUCCI: You can answer the question, but
2 just objection on the basis of it calls for
3 speculation.

4 A. I'm just going to say that I didn't look at it as an
5 opportunity of anybody running the meeting. I looked at it
6 as the board getting together and having a conversation. So
7 I was not looking at it in those terms.

8 Q. I understand how you were not looking at it, but I'm
9 asking you to go back to August of '02 and recall the meeting
10 and who played the role of running that meeting.

11 A. I don't recall who played the role of running it,
12 but I can tell you, that, yes, Mr. Coleman had things to say,
13 just like several other board members had things to say.

14 Q. Now, you testified earlier that Mr. Hamilton, the
15 board president, tended not to attend meetings of the board
16 of directors, and so Mr. Coleman would run it, right?

17 A. I -- I got confused when you said tended not to. I
18 don't understand that part.

19 Q. You earlier testified that Mr. Hamilton, the
20 president of the board of directors --

21 A. Yes.

22 Q. -- tended not to be present for board of directors'
23 meetings and Mr. Coleman would run them.

24 A. Okay.

25 Q. Is that correct?

1 A. When you said --

2 MR. MARTINUCCI: I think you're giving a composite
3 of his answers to a couple of different questions,
4 and I think that's what's causing the confusion.

5 MS. BENSON: You're right. I'm summarizing his
6 response.

7 MR. MARTINUCCI: So you're not representing that
8 this is his testimony, you're saying the summary of
9 his testimony?

10 MS. BENSON: I am summarizing his answers, and my
11 summary's accurate.

12 Q. You had earlier testified that -- from the point
13 that you came on the board, which was in January of '02,
14 okay, that Mr. Hamilton, the then current president of the
15 board of directors, tended not to be present and Mr. Coleman,
16 in his capacity as vice president of the board of directors,
17 ran the meetings; isn't that correct?

18 A. Mr. Coleman was present at the meetings. In his
19 capacity you would suggest that he would run the meetings,
20 but then again, when I attended the meetings for the board,
21 it was very difficult to distinguish who was running the
22 meetings. Knowing Mr. Coleman's capacity, though, as vice
23 chair, you would say, yes, it is possible that he could run
24 the meetings, but during the most of the meetings it wasn't
25 clear on who was running the meetings. We would meet with

1 knowing that the president wasn't there, and yes, in most
2 board and governing bodies, if the president is not
3 available, the vice president or vice chair would take that
4 responsibility. Now, in every meeting that I attended at the
5 Booker T. Washington Center, if you're asking me if
6 Mr. Coleman ran those meetings, I'd have to say I couldn't
7 say whether he ran them or just attended them.

8 Q. You would acknowledge that the board members
9 recognize Mr. Coleman as vice president of the board of
10 directors?

11 MR. MARTINUCCI: Objection. He can only speak to
12 what he knows or what he believed or what he
13 perceived. He can't tell you what other board
14 members did.

15 Q. I'm asking, what did you perceive?

16 MR. MARTINUCCI: No. You're asking what other
17 board members perceived. Are you asking him what
18 his perception was?

19 MS. BENSON: Let me go back.

20 Q. You recognize that Mr. Coleman was vice president of
21 the board of directors; is that correct?

22 A. Yes.

23 Q. And you recognize that in that capacity, in the
24 absence of the president, he had the responsibility to run
25 meetings; is that correct?

1 A. In the absence of the president, with that position,
2 yes, it would be looked at.

3 Q. Now, I'm going to show you a document here, it's
4 labeled "Booker T. Washington Center Incident Report," and I
5 just want you to take a few minutes to look it over --

6 MR. MARTINUCCI: Are you marking that?

7 MS. BENSON: Yes.

8 A. Okay.

9 Q. When the board met in August, and you said Anita
10 Smith was called into the meeting at some point, did the
11 board of directors receive a copy of this report? And by the
12 way, it's referred to as Exhibit 1.

13 (Jeffress Deposition Exhibit No. 1 marked for
14 identification.)

15 A. I don't know if the board of directors received this
16 report. I don't believe I received it.

17 Q. So during this meeting, at which you testified
18 Mr. Sherrod resigned and Ms. Smith was called into the
19 meeting, you don't recall ever seeing Exhibit 1?

20 A. Like I said, I -- I believe that most of the reports
21 that were given on that day were verbal.

22 Q. Have you ever seen Exhibit 1?

23 A. I believe I may have seen it, yes.

24 Q. When do you think you saw it?

25 A. Probably during -- after the fact when -- looking

1 through paperwork and talking to Ms. Smith about it.

2 Q. When you say "after the fact," after what fact?

3 A. After August. So sometime in September.

4 Q. Sometime in September 2002?

5 A. Correct.

6 Q. Can you give us -- pin it down a little bit --

7 A. No. Because I don't remember even actually -- like
8 I said, during that time I saw a lot of paperwork, stuff was
9 coming through, things were going on. I know the verbal
10 report, so therefore, I -- I recognize what's written.

11 Q. What led you, in September 2002, to have a
12 conversation with Ms. Smith?

13 A. Ms. Smith was basically updating us -- or updating
14 me on what happened, what was going on, and -- we were having
15 a conversation because we were still right in the middle of
16 this situation trying to figure out what we could do.

17 Q. You said you were right in the middle of the
18 situation trying to figure out what to do. What do you mean
19 being right in the middle of the situation?

20 A. We were in the middle of whether or not we have an
21 executive director or we -- do we have an executive director
22 or do we not have an executive director.

23 Q. So there's a meeting in August of 2002, and in
24 September you're still discussing do you have an executive
25 director or don't we have one?

1 A. Correct.

2 Q. When you were removed from the board of directors,
3 was that in writing?

4 A. I don't know.

5 Q. Is there any minutes that reflect your removal?

6 A. I'm not sure.

7 Q. When did you express an interest in helping the
8 Booker T. Washington Center in a capacity other than as a
9 member of the board of directors?

10 A. My -- I was in the capacity of a board member when I
11 expressed an interest in helping Booker T. Washington Center
12 through this situation.

13 Q. When was that?

14 A. That was when I had a conversation with Mr. Sherrod.

15 Q. When did this conversation occur?

16 A. This conversation took place after the incident,
17 after Mr. Sherrod had said he resigns, and basically my
18 conversation with Mr. Sherrod was, this is terrible. We need
19 to basically be able to move forward. I'm not saying --
20 can't be passing judgment on who's right or who's wrong, but
21 we need to get through this for the organization. Can we
22 work something out in terms of, if the board doesn't want you
23 executive director, then we need to look at your future as
24 well as the organization's future, and I'm willing to work
25 between you and the board to see how we can make this thing

1 work out.

2 If you need to move on and the organization moves
3 on, then I'm willing to work that -- that may take a year,
4 that may take six months, or that may take until the time you
5 find other employment. But if you can come back as taking --
6 with your responsibilities and help this organization through
7 a transition period, I'll work with the board and bring that
8 back to the board. Just as long as we can all move forward
9 and get through this.

10 Q. When did you have this conversation with
11 Mr. Sherrod?

12 A. I don't know the exact date, but I believe it's
13 about maybe a week or -- week or so after the incident.

14 Q. When you say -- the incident or this board meeting
15 that you previously described?

16 A. The incident --

17 Q. The incident was August 6, 2002.

18 A. And the board meeting was probably on a Monday, I
19 believe. Again, I don't have anything in front of me. I
20 don't know what August 6th was back in 2002. But if you look
21 at it after the incident, after the board meeting, the
22 question came down to did Mr. Sherrod resign. Says, yes.
23 Well, he hasn't turned in his resignation. Well, I'll go
24 talk to him to see what's going on. That's when I had the
25 conversation with him. I said, listen, bottom line comes

1 down to, I don't know what the history is, but the
2 organization needs to move forward, you need to move forward,
3 I know you got to think about your employment. How can we do
4 this. Can we do this transition. And you never know, by the
5 time we get through this, maybe some of the stuff will have
6 died down.

7 And at that time we were having a conversation, Mr.
8 Sherrod said to me, well, I want people to know my side of
9 the story because people are giving the wrong side of the
10 story here, and I want people to know what I'm saying. And I
11 believe it was Mr. Flowers at that time wanted to interview
12 him for a newspaper to get his side of the story. I said,
13 James, if I were you, I wouldn't do it. I said, I think we
14 can move forward with this. He said, well, I'll think about.
15 I'll see what to do.

16 The next day, basically the newspaper article came
17 out -- because I had called some of the board members and
18 said, listen, I think we'll be able to work through this.
19 The next day the newspaper article came out, and they said, I
20 thought you said we were going to be able to work through
21 this. I thought you said James was on board with trying to
22 work through this. I said, I thought so, too. When I left
23 him, he -- he gave me the indication he wasn't going to do
24 the article, and then he responded in the article.

25 At that time, when I did get to see the article, I

1 contacted James and said, what's going on. He said, I just
2 wanted my side to be out. I said, okay, but now everything
3 we talked about, my hands are tied with the board. I can't
4 do much with them because that's it. And that's how that
5 took place. So that was my initial, answering your question,
6 on how I got involved with trying to work through the
7 transition.

8 MR. MARTINUCCI: Just for everybody's benefit,
9 August 6th was a Tuesday, 2002; August 12th was a
10 Monday in 2002.

11 Q. Going back to the question of when did you show this
12 interest in this transitional role. Can you narrow that down
13 as to when you expressed an interest in playing this
14 transitional role?

15 A. I thought I just did. That's when I expressed an
16 interest.

17 Q. So it was after the August 12th board meeting?

18 A. Correct. It was after my meeting -- I only -- I
19 didn't even express an interest to the board. I expressed an
20 interest to resolve the problem with Mr. Sherrod.

21 Q. I want you to take a few moments and read what will
22 become Exhibit No. 2.

23 (Jeffress Deposition Exhibit No. 2 marked for
24 identification.)

25 A. (Witness reviewed document.)

1 Q. There's a notation on Exhibit 2 that Exhibit 2 is a
2 letter from you to the board; is that correct?

3 A. Yes.

4 Q. So you wrote Exhibit 2?

5 A. Yes.

6 Q. Exhibit 2 is not dated, so when did you write it?

7 A. I wrote this after I had the conversation with Mr.
8 Sherrod.

9 Q. Can you tell us what month it was sent?

10 A. This had to be in the month of August.

11 Q. Who did you give this to? Exhibit 2, who did you
12 give it to?

13 A. I don't recall, but I do know that it was passed out
14 during the board meeting.

15 Q. It was passed out during the board meeting?

16 A. I believe so, yes.

17 Q. When was this board meeting that this was passed
18 out?

19 A. I don't recall.

20 Q. It would be reflected -- if that meeting was
21 recorded, it would be reflected that you passed it out,
22 right?

23 A. Yes.

24 Q. Prior to your having this conversation with
25 Mr. Sherrod about a transitional role, had you spoken with

1 any of the board members about doing so?

2 A. I'm not sure about the timing.

3 Q. Prior to your giving this letter, Exhibit 2, to the
4 board of directors, had you discussed that possibility with
5 any board members?

6 A. It's possible, yes.

7 Q. Who might you have discussed it with?

8 A. Cathy Lyons.

9 Q. Anyone else?

10 A. I don't think so.

11 Q. So you don't think you discussed it with anyone
12 else. Did you possibly discuss it with Mr. Sean Coleman?

13 A. During the board meeting and -- I believe, yes.

14 Q. What about --

15 A. When I passed this out, that's when I had the
16 discussion with Mr. Coleman.

17 Q. You didn't have any discussion with him prior to the
18 passing out of Exhibit 2 to the --

19 A. Not that I recall.

20 Q. Now, after August the 12th, after this meeting where
21 Mr. Sherrod was either asked to resign or resigned, how many
22 times would you say you spoke to Mr. Sherrod?

23 A. After?

24 Q. Yes.

25 A. I can't pinpoint it, but it was at least several

1 times.

2 Q. Over what period of months?

3 A. From -- let's say, after August 12th to, let's say,
4 September 20th.

5 Q. Why do those two dates stand out for you?

6 A. Because we just confirmed that August 12th was the
7 day that we had the meeting, and then, directly after the
8 meeting I know I talked to him several occasions after that.
9 September, I say, 20th because I know somewhere around
10 September 20-something was the final say that Mr. Sherrod was
11 not resigning, and all the above when we -- between that time
12 frame I think that we already seeked (sic) legal counsel on
13 what we were going to be doing something. So I know around
14 September 20-something we were right there. So after that it
15 was just, you know, a done deal, basically.

16 Q. Now, earlier in your answer you made reference to
17 Mr. Flowers. Were you referring to Kevin Flowers, the
18 reporter for the Erie Times-News?

19 A. I believe so, yes.

20 Q. Also, earlier in response to a question I gave you
21 you said it came down to a question of did he resign or not.

22 A. Correct.

23 Q. So from August the 12th till sometime in September,
24 that was still up in the air; wasn't it?

25 A. Because he resigned at the board meeting, but he did

1 not formally send in a written resignation. So, therefore,
2 the board said, we know he resigned, but we'd still like to
3 have something in writing.

4 Q. And the tape of the August 12th meeting would be in
5 the possession of Anita Smith; is that your testimony?

6 A. No. I said, if there was a tape, it's possible that
7 it would be in the possession of Anita Smith.

8 Q. Was that meeting recorded?

9 MR. MARTINUCCI: Objection. Asked and answered.

10 You can go ahead and answer it again.

11 A. I don't recall.

12 Q. Let me give you a few moments to read what will be
13 labeled Exhibit 3.

14 (Jeffress Deposition Exhibit No. 3 marked for
15 identification.)

16 A. (Witness reviewed document.)

17 Q. Had enough time to review it?

18 A. Yes. To review it, yes.

19 Q. Do you recognize Exhibit 3?

20 A. Yes.

21 Q. Tell us what Exhibit 3 is.

22 A. Termination of employment regarding Mr. Sherrod.

23 Q. And whose signature is on that letter?

24 A. Sean P. Coleman, vice president.

25 Q. What's the date of that letter?

1 A. September 24, 2002.

2 Q. Now, how did this letter come about?

3 A. After seeking legal counsel and not being able to
4 work a severance package out, and not receiving any letter of
5 resignation from Mr. Sherrod.

6 Q. When did the board of directors decide to retain
7 legal counsel with regard to Mr. Sherrod?

8 A. I'm not sure.

9 Q. Would that be reflected in the board of directors'
10 minutes?

11 A. It was stated during the meeting if the -- yes.

12 Q. Which meeting?

13 A. One of the meetings of the board of directors.

14 Q. Between August 12th --

15 A. August 12th.

16 Q. -- and September the 24th?

17 A. Yes.

18 Q. Were those minutes recorded?

19 A. I'm not sure.

20 Q. If they were recorded, who would have possession of
21 the tapes?

22 A. If they're recorded, they would be at the Booker T.
23 Washington Center, and possibly Anita Smith.

24 Q. Now, was Mr. Coleman designated as the person who
25 should represent the board of directors with counsel?